

July 23, 2012

Postal Regulatory Commission

901 New York Avenue NW, Suite 200

Washington, DC 20268

Reference: Complaint Regarding Postal Service Offering DOCKET # MC2012-26  
Enhanced Service Product for Competitive PO Boxes

Dear Commissioners,

I am the owner of Max's EZ Mail, established in 1994 and employ four from our community. I am also a member of the USPS Approved Shippers Program. We are a Commercial Mail Receiving Agency (CMRA) and have some comments about the United States Postal Service venturing into additional services for their PO Boxes. While it has been determined that those boxes are competitive with our Private Mail Boxes (PMB)'s there are still distinct differences that set them apart from our PMB's. The new service of email notification, being offered by the USPS, is one of the new services. The USPS has not been notifying their PO Box customers. The service requires labor and technology to implement and maintain. These items have a cost and to say they are included in the base cost of a PO Box, when the service is new, contradicted the statement made by the USPS that they are already providing these services and that they are bundled into the PO Box rental fee. If the services were available in the past this may be true but, as new services, there is a clear difference between the past and the present.

The second new service that is now available is street addressing for private carrier delivery to the PO Box. I have a few objections to this. The USPS claims that some companies will not deliver their products to a PO Box due to fraud. By masking the actual PO Box with a street address USPS is assisting in deceiving the merchants that they are not shipping goods to a PO Box. USPS is going to cause my business harm in the same manner that they are deceiving the merchant. Once it becomes common knowledge that the USPS is using the # sign to mask their PO Boxes, CMRA addressing will be swept up with the same brush and we will end up losing

customers because of the required addressing standards that the USPS has imposed on CMRA's. The acceptance of the packages at the street address causes a conflict with USPS policy and procedures of getting a signature for accountable, insurable and registered mail products. The expectation and legal right of the mailer is being misused and deceived by the blanket acceptance from the USPS will require for the acceptance of mail at the street address. Is the acceptance of a package at the street address using the release sufficient to maintain the high standards of the registered mail piece, or the court recognized certified mail piece or even the USPS own standards for the insured mail piece? Street addressing costs and logistics involved do not justify a no charge bundling of this service. By the USPS's own admission there is a cost involved in moving those packages from a receiving area to the delivery area. If there is a cost then there needs to be postage to cover those costs. I cannot hand mail, directed to the local postmaster, to my letter carrier for internal delivery to a postmaster without placing a stamp on it, so everything handled by USPS personnel needs some sort of postage. While there has been a 25% increase in pricing nothing in the USPS filing shows a breakdown of costs to prove that the costs of implementing these specific new additional services is covered by the increase. The USPS has not shown the detailed costs involved in providing the form completion, at the retail counter, the database support or the costs involved in physically storing these street address packages for pickup at the retail counter. Additionally the time spent at the retail counter retrieving and handing said packages over to the mailbox holder have not been detailed.

In conclusion email notification and street addressing as premium service doesn't seem to be what the public wants. What the USPS is doing is fundamentally wrong. A financially viable Post Office is an important part of our business, but not at our expense. I cannot sit by and watch the USPS launch a series of products and services specifically designed to take our customers away.

These new business practices place the United State Postal Service in direct and unequal competitions with thousands of small business across the country. For most of store owners like me, our businesses are privately owned. In many cases, we have financed the purchase of our business with secured loans or retirement funds. This new form of competitions from the USPS will result in significant loss of revenue and damage to my business. This will threaten not only my financial security, but also the jobs of my employees.

Thank you for your time and consideration to this matter.

Sincerely,

Kathy Shannon

Owner